

VIA ECF

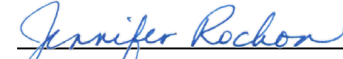
February 26, 2024

Hon. Jennifer L. Rochon, U.S.D.J.  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Courtroom 20B  
New York, NY 10007-1312

The request is GRANTED. The post-discovery pre-trial conference is adjourned from March 6, 2024 to May 2, 2024 at 12:00 p.m.

**SO ORDERED.**

Dated: February 27, 2024  
New York, New York

  
**JENNIFER L. ROCHON**  
United States District Judge

Re: **Joint letter motion for adjournment and extension of discovery; Carriel et al v. Westfront Associates LLC et al.; 1:22-CV-09426 (JLR)**

Dear Judge Rochon:

The parties write this joint letter to request an adjournment of the March 6, 2024, pre-trial conference, as set in this Court's Order entered January 2, 2024, (ECF No. 40), and for an extension of the corresponding discovery deadlines as set forth in the parties' previous joint letter motion, dated December 28, 2023 (ECF No. 39). This is the parties' third request for same, the first two of which have been granted. This request is made in furtherance of potential settlement and, in its absence, the completion of discovery. After narrowing discovery disputes via email, on February 20, 2024, the parties held a telephonic meet-and-confer in a good-faith effort to discuss a resolution of this matter. The parties expect to continue settlement discussions in order to work toward a final resolution of the Plaintiffs' claims in the case.

The parties propose an adjournment of the pre-trial conference for eight (8) weeks, on a date and time of the Court's choosing, with the following dates being mutually agreed upon between the parties: May 1, 2, or 3. To the extent we are unable to come to a resolution, the parties shall endeavor to complete all outstanding discovery as follows:

- Supplemental responses to document demands and interrogatories shall be served on or before March 29, 2024.
- Fact depositions shall take place on or before April 19, 2024.
- Requests to admit shall be served on or before April 26, 2024.
- All expert discovery, if any, and any other remaining discovery, shall be completed on or before April 30, 2024.

Respectfully submitted,

**MOBILIZATION FOR JUSTICE, INC.**

**BELKIN BURDEN GOLDMAN LLP**

By: /s/ Andrew Darcy  
Andrew Darcy, Esq.  
*Attorneys for Plaintiff*

By: /s/ Jay B. Solomon  
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